

# EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

Index #

-----X  
LEEORA BERNSTEIN,

Plaintiff,

-against-

TARGET CORPORATION,

Defendant.  
-----X

**SUMMONS WITH NOTICE**

Plaintiff designates KINGS  
County as the place of trial

The basis of venue is:  
Plaintiff's Residence

Plaintiff resides at:  
County of Kings

**To the above named Defendant:**

**You are hereby summoned** to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

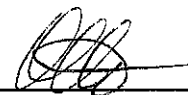
Dated: NEW YORK, NEW YORK  
February 20, 2020

**Defendant's address:**

TARGET CORPORATION  
Target Plaza  
1000 Nicollet Mall  
Minneapolis, Minnesota, 55403

**Plaintiff's attorneys:**

ARNOLD E. DIJOSEPH, PC



Arnold E. DiJoseph, III, Esq.  
50 Broadway, Suite 1000  
New York, New York 10004  
(212) 344-7858

**NOTICE: THE NATURE OF THIS ACTION IS AS FOLLOWS:** Personal Injury

**THE RELIEF SOUGHT IS AS FOLLOWS:** Money Damages

**UPON YOUR FAILURE TO APPEAR:** Judgment will be taken against you by default for the sum of an amount beyond the jurisdictional limits of all lower courts, with interest from March 17, 2019 and the costs of this action.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
LEEORA BERNSTEIN,

Plaintiff,

**VERIFIED COMPLAINT**

-against-

TARGET CORPORATION,

Defendant.  
-----X

Plaintiff, by her attorneys, ARNOLD E. DIJOSEPH, P.C., complaining of the  
Defendant, respectfully alleges upon information and belief:

1. Plaintiff, LEEORA BERNSTEIN, was and still is a resident of the State of  
New York, County of Kings.

2. That at all times hereinafter mentioned, defendant, TARGET  
CORPORATION (hereinafter "TARGET") was and still is a domestic corporation duly  
authorized and existing under and by virtue of the laws of the State of New York,  
having a place of business at Target Plaza, 1000 Nicollet Mall, Minneapolis, Minnesota,  
55403.

3. Defendant, TARGET, is a duly organized foreign corporation doing  
business within the State of New York.

4. Defendant, TARGET, is a duly organized foreign corporation transacting business in the State of New York.

5. Defendant, TARGET, does and/or solicits business within the State of New York.

6. Defendant, TARGET, derives substantial revenue from goods used or consumed or services rendered in the State of New York.

7. Defendant, TARGET, expected or should reasonably have expected its acts and business activities to have consequences within the State of New York.

8. Defendant, TARGET, derives substantial revenue from interstate or international commerce.

9. Defendant, TARGET, is a duly organized partnership existing and doing business under the laws of the State of New York.

10. Defendant, TARGET, is a duly organized proprietorship existing and doing business under the laws of the State of New York.

11. That on or about March 17, 2019, TARGET CORPORATION, was the owner of the premises known as TARGET located at 519 Gateway Drive, Brooklyn, NY 11239.

12. That on or about March 17, 2019, defendant, TARGET, had an agreement to lease the aforesaid premises.

13. Defendant, TARGET, by its agents, servants, and/or employees, operated the aforesaid premises.

14. Defendant, TARGET, by its agents, servants, and/or employees, managed the aforesaid premises.

15. Defendant, TARGET, by its agents, servants, and/or employees, controlled the aforesaid premises.

16. Defendant, TARGET, by its agents, servants, and/or employees, maintained the aforesaid premises.

17. Defendant, TARGET, by its agents, servants, and / or employees, supervised the aforesaid premises.

18. Defendant, TARGET, by its agents, servants, and/or employees, inspected the aforesaid premises.

19. Defendant, TARGET, by its agents, servants, and / or employees caused, permitted and allowed a dangerous and defective condition to exist at the aforesaid premises.

20. Defendant, TARGET, by its agents, servants and/or employees, failed to set up barriers and/or safeguards around the dangerous condition.

21. Defendant, TARGET, by its agents, servants and/or employees caused, permitted and allowed the premises to remain in an unsafe, hazardous and trap-like condition.

22. That at all times hereinafter mentioned, it was the duty of the defendant, TARGET, by its agents, servants and/or employees, to keep and maintain the premises in a reasonably safe and proper condition for use by the public, including the plaintiff herein.

23. That on or about March 17, 2019, while plaintiff, LEEORA BERNSTEIN, was lawfully walking through aisle B39 of the premises known as TARGET, located at 519 Gateway Dr, Brooklyn, NY 11239, she was caused to slip and fall due to a slippery condition on the floor of the store.

24. Plaintiff, LEEORA BERNSTEIN, was injured.

25. Plaintiff, LEEORA BERNSTEIN, was seriously injured.

26. That said occurrence was due to the negligence and carelessness of the TARGET CORPORATION, in the ownership, operation, management, maintenance, control, inspection, supervision and cleaning of the aforesaid premises, all of which the defendant had due notice, and through no fault or lack of care on the part of the plaintiff herein.

27. That the aforesaid occurrence and resulting injuries to the plaintiff was due to the carelessness, recklessness and negligence of the defendant without any fault or wrongdoing on the part of the plaintiff contributing thereto.

28. This action falls within one or more of the exceptions set forth in CPLR 1602(2).

29. That by reason of the foregoing, the Plaintiff has been damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**WHEREFORE**, Plaintiff LEEORA BERNSTEIN, demands judgment against the Defendant, TARGET CORPORATION, herein, in an amount exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: New York, New York  
February 20, 2020

Yours, etc.

ARNOLD E. DiJOSEPH, P.C.  
Attorneys for Plaintiff  
LEEORA BERNSTEIN  
50 Broadway -Suite 1000  
New York, New York 10004  
(212) 344-7858

## VERIFICATION

STATE OF NEW YORK                    )  
  ).SS:  
COUNTY OF NEW YORK                )

ARNOLD E. DIJOSEPH, III, an attorney at law, duly admitted to practice in the Courts of this State, affirms the following, under penalties of perjury:

1. I am a member of the law firm of ARNOLD E. DIJOSEPH, PC attorneys for the plaintiff in the within action.
2. I have read the foregoing Complaint and know the contents thereof, and upon information and belief, deponent believes the matters alleged therein to be true.
3. The reason this Verification is made by deponent and not by plaintiff is that plaintiff herein resides in a County other than the one in which plaintiff's attorneys maintain their office.
4. The source of deponent's information and the grounds of his belief are communications, papers, reports and investigations contained in the file.

Dated: New York, New York  
February 20, 2020

  
\_\_\_\_\_  
ARNOLD E. DIJOSEPH, III

Index No.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

---

LEEORA BERNSTEIN,

Plaintiff,

-against-

TARGET CORPORATION,

Defendant.

---

**SUMMONS and VERIFIED COMPLAINT**

---

**ARNOLD E. DIJOSEPH, P.C.**  
***Attorneys for Plaintiff***  
**50 Broadway -Suite 1000**  
**New York, New York 10004**  
**212-344-7000**

---